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May 4, 2021

VIA ECF

Honorable Sidney H. Stein United States District Court 500 Pearl Street New York, NY 10007

MEMO ENDORSED, p. 2

Re:

Quezada v. Boss Art Culture, LLC SDNY Case No.: 1:21-cv-02143

Dear Judge Stein:

This law firm represents the Defendant, Boss Art Culture, LLC, in connection with the above-captioned matter. An initial pretrial conference is scheduled for May 11, 2021 at 9:30 a.m.

Counsel for Defendant has a scheduling conflict on the same date and time. Counsel is set to appear at a previously scheduled hearing in another matter, set for the same day at 9:00 am. The case is *In re Kathleen Szabo*, Southern District of Florida Bankruptcy Court, Case. No. 21-11103-EPK.<sup>1</sup> In addition, yet another hearing is set in that same case at 1:00 p.m. Defendant respectfully requests that this Court adjourn the conference to an alternate date and time. This is our first request for an adjournment of this conference, and the request will not prejudice any parties or affect any other scheduled dates. Counsel for Plaintiff has no objection to the relief requested herein.

We thank the Court for your time and consideration in this matter.

Respectfully Submitted,

Law Offices of Nolan Klein, P.A.

By: <u>/s/ Nolan Klein</u> NOLAN K. KLEIN, ESQ.

NKK/amd

cc: Mars Khaimov, Esq. (via ECF)

<sup>&</sup>lt;sup>1</sup> Counsel for Defendant is filing a motion with the bankruptcy court to adjourn the 9 a.m. hearing on substantive grounds, but it is not yet clear whether that will be granted or if it will proceed.

## Quezada v. Boss Art Culture, LLC, Case No.: 1:21-cv-02143

The conference is adjourned to May 13, 2021, at 10:00 a.m.

Dated: New York, New York

May 4, 2021

SO ORDERED:

Sidney H. Stein, U.S.D.J.